

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ZEO HEALTH LTD., MICAH PORTNEY,  
TOUCHSTONE LIFE ESSENTIALS, INC.,  
and NORWOOD E. STONE,

Plaintiffs,

-against-

ZOI GLOBAL, LLC, LORI R. LEE, DENISE  
STEPHENS, METRON  
NUTRACEUTICALS, LLC, and,  
NIKOLAOS TSIRIKOS-KARAPANOS,

Defendants.

Case No. 2:21-cv-11410 (ES)(MF)

**NOTICE OF MOTION TO DISMISS PURSUANT TO FED. R. CIV. P. 12(b)(6)**

**PLEASE TAKE NOTICE** that upon the accompanying Brief and the Declaration of Paul S. Danner, dated August 6, 2021, and the exhibits attached thereto, the undersigned attorneys for Defendant Lori R. Lee (“Lee”) will move this Court at the United States District Courthouse, Newark, New Jersey, on September 7, 2021 at 9:00 a.m., or as soon thereafter as counsel may be heard, for an Order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing Plaintiffs’ Complaint against Ms. Lee.

**PLEASE TAKE FURTHER NOTICE** that, in support of her motion, Ms. Lee relies on the Brief submitted with this Notice of Motion, the Declaration of Paul S. Danner, any oral argument, and upon all pleadings and proceedings on file herein.

**PLEASE TAKE FURTHER NOTICE** that a Proposed Order granting the motion is submitted herewith.

Dated: Newark, New Jersey  
August 6, 2021

By: /s/ Paul S. Danner  
Paul S. Danner  
GOLDBERG SEGALLA LLP  
1037 Raymond Blvd., Suite 1010  
Newark, New Jersey 07072  
Phone: (973) 681-7000  
Fax: (973) 681-7101  
*Attorneys for Defendant*  
*Lori R. Lee*

**CERTIFICATE OF SERVICE**

I hereby certify that I caused Ms. Lee's Notice of Motion pursuant to Fed. R. Civ. P. 12(b)(6), Brief, Declaration of Paul S. Danner with the exhibits attached thereto, and a Proposed Order to be filed with this Court and served on all counsel of record through the ECF system.

/s/ Paul S. Danner

Paul S. Danner